

Message

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Sent: 1/11/2022 6:15:33 PM
To: Regan, Michael [Regan.Michael@epa.gov]
CC: Utech, Dan [Utech.Dan@epa.gov]; Fox, Radhika [Fox.Radhika@epa.gov]; Freedhoff, Michal [Freedhoff.Michal@epa.gov]; Prieto, Jeffrey [Prieto.Jeffrey@epa.gov]; Goffman, Joseph [Goffman.Joseph@epa.gov]; Garcia, Lisa [Garcia.Lisa@epa.gov]; Szaro, Deb [Szaro.Deb@epa.gov]; Carbonell, Tomas [Carbonell.Tomas@epa.gov]; Bermudez, Navis [Bermudez.Navis@epa.gov]; McLain, Jennifer L. [McLain.Jennifer@epa.gov]; Laureano, Javier [laureano.javier@epa.gov]; Thompkins, Anita [Thompkins.Anita@epa.gov]; Christine.harada@fpisc.gov; John.Cossa@fpisc.gov
Subject: POTENTIAL HARM FROM PFAS CONTAMINATION AND CLEAN AIR ACT POLICY -- SOUTH FORK OFFSHORE WIND FARM
Attachments: FinalCPW Corps404 Letter.pdf; FinalCPW EPA404 Letter.pdf; FinalCPW EPAcaa Letter.pdf; FinalCPW EPAsdwa Letter.pdf

Dear Administrator Regan,

My name is Gouri Edlich and I am Chairwoman of the Citizens for the Preservation of Wainscott (CPW). CPW is devoted to preserving the natural beauty and bucolic character of Wainscott, New York.

We write this email to you with respect to the South Fork Wind Farm (SFWF), located at the eastern port of Long Island, New York. This offshore project will include 12 wind turbine generators, submarine cables, an offshore substation, an alternative current (AC) electric cable and interconnection facility that connects the SFWF to the existing mainland electric grid in East Hampton, New York.

We are specifically concerned about the serious public health and environmental impacts resulting from the project's proposed construction of a 138-kilovolt AC transmission cable that will run through the hamlet of Wainscott in the Town of East Hampton, New York.

CPW fully supports renewable energy and New York state's commitment to increase renewable energy development to address the serious issue of climate change. Our serious concern arises from SFWF's reckless and unprecedented proposal to construct a high-voltage transmission line, connecting electricity generated from offshore wind turbines to an onshore substation, directly through a residential community and adjacent to a state Superfund site. This onshore construction has the potential for increased exposure from the spread of per- and polyfluoroalkyl substances (PFAS), including perfluorooctanoic acid (PFOA) and perfluorooctane sulfonic acid (PFOS), among others.

We are also concerned about the air emissions resulting from the offshore construction activities from the SFWF and the significant change in policy to not require those emissions to be offset.

There are three letters attached that are addressed to you requesting that the U.S. Environmental Protection Agency (EPA) act. The first two letters relate to using EPA's authority under the Clean Water Act (CWA) and Safe Drinking Water Act (SDWA) to prevent PFAS exposure from onshore construction activities from the SFWF AC transmission cable. EPA has broad authority and an imperative to protect our water quality and we believe that these authorities must be used before any construction is allowed to begin.

The third letter relates to the Clean Air Act (CAA) and the significant change in air permitting policy that seems to have occurred related to the CAA Section 328 air permit for the SFWF. While EPA has historically required companies to purchase offsets for offshore construction activities the EPA completely changed course during this permit and is now proposing to not require these offsets. This change means that EPA would no longer require the company to obtain up to 400 tons of nitrous oxide (NOx) offsets, or more than 16 times the estimated annual operation-phase offset requirement.

To ensure that there is full transparency and understanding, we have also attached a similar letter on the Clean Water Act Section 404 permit issues that we have concurrently sent to the U.S. Army Corps of Engineers.

Thank you very much for your consideration,

Gouri Edlich

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